

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re: Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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This document relates to:

Burnett, et al, v. The Islamic Republic of Iran, et al,; No. 15-cv-9903 (GBD)(SN)

DECLARATION OF CHRISTIAN C. CRONER

I, CHRISTIAN C. CRONER, hereby declare under penalty of perjury as follows:

1. I am 48 years old and reside in Staten Island, New York.
2. I am the stepson of Joseph W. Flounders who was killed in the September 11, 2001 terrorist attacks on the World Trade Center in New York where he worked as a Broker for Euro Brokers, Inc.
3. I was seven years old in 1979 when my mother and Joseph Flounders were married and we began living together as a family. I continued to reside with them in our family home for fourteen years until 1993 when I myself was married.
4. I was an infant when my mother divorced my biological father and I have no memory of him at all before meeting him for the first time when I was 30 years old. My biological father played no role whatsoever in my life. He has never provided financial, emotional, moral or any other kind of support to me.
5. Joseph Flounders was the primary breadwinner in our family and he assumed all financial responsibility for raising me. Together with my mother, Joseph provided the moral, emotional and spiritual guidance that makes me who I am today.
6. Throughout the fourteen years I resided with Joseph Flounders, he sheltered me, fed me, clothed me, protected me and kept me safe. He also disciplined me when necessary and taught me right from wrong.
7. Throughout the fourteen years I resided with him, I was completely dependent on Joseph Flounders.

8. I have always referred to Joseph Flounders as my father; his parents as my grandparents; and they have always referred to and treated me accordingly. Joseph's family was my family and they still are today.

9. Throughout the fourteen years I resided with him, Joseph Flounders listed me as his dependent on his federal and state income tax returns.

10. Throughout the fourteen years I resided with him, Joseph Flounders provided health insurance coverage for me.

11. As a Broker for a New York brokerage house, Joseph Flounders instilled in me the importance of an education, and taught me the importance of learning mathematics and working with figures.

12. Joseph Flounders paid for my primary education at two different private schools in the greater New York City area.

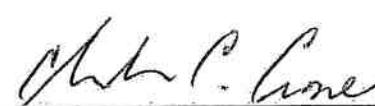
13. Joseph Flounders was not a sports fan in general. Despite that, he would spend time with me as I explored organized basketball and hockey. We would often throw a baseball or football to one another after he returned from work or on the weekends. From time-to-time, Joseph would come home from work and surprise me with tickets he had obtained to a professional sporting event in New York City. Even though he was not a fan, he would take me to these events even though he had worked a long day.

14. As I reached adolescence, Joseph Flounders helped me navigate those awkward years.

15. Joseph Flounders was my father in all ways. His murder on September 11, 2001 has forever changed my life in a profound way: less than three months after 9/11, my mother, unable to overcome her grief, took her own life.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 3/28/2021


Christian C. Croner